

DOCUMENTS FOR NOTICE OF REMOVAL

DC-16-05944

Freeney Anita

CAUSE NO. _____

MATTHEW HIGGINS

Plaintiff,

VS.

ROAD STAR CARRIER, INC. d/b/a
ROAD STAR TRUCKING and
MIROSLAW SKOCZYLAS*Defendants.*§
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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

J-191ST
_____ JUDICIAL DISTRICT**PLAINTIFF'S ORIGINAL PETITION, JURY DEMAND,
REQUESTS FOR DISCLOSURE, AND RULE 193.7 NOTICE**

COMES NOW, MATTHEW HIGGINS, Plaintiff in the above-styled and numbered cause of action complaining of Defendants ROAD STAR CARRIER, INC. d/b/a ROAD STAR TRUCKING and MIROSLAW SKOCZYLAS and in support thereof would show unto this Honorable Court the following:

I. DISCOVERY CONTROL PLAN

1.1 Pursuant to Texas Rule of Civil Procedure 190.1 and 190.4 of the Texas Rules of Civil Procedure, discovery is intended in this lawsuit to be conducted under Level 3.

II. CLAIM FOR RELIEF

2.1 Plaintiff seeks monetary relief over \$200,000 but no more than \$1,000,000.00.

III. PARTIES

3.1 Matthew Higgins ("Plaintiff Higgins") is a resident of Dallas County, Texas.

3.2 Road Star Carrier, Inc. d/b/a Road Star Trucking ("Defendant Road Star") is a foreign limited liability company authorized to do business in the State of Texas. This action

arises out of a wreck involving a truck driver who was driving on behalf of Defendant Road Star, a motor carrier with its principal office in Canada; therefore, service upon Defendant Road Star may be made pursuant to Texas Civil Practice and Remedies Code §§ 17.061 - 17.069. Process should be served on Defendant Road Star by serving Tryon D. Lewis, Chairman of the Texas Transportation Commission, at 125 E. 11th St., Austin, Texas, 78701-2483, to be forwarded to Rob Dhanoa, 8201 Lawson Road, Milton, Ontario L9T 5E5.

3.3 Mirosław Skoczylas (“Defendant Skoczylas”), an individual, may be served with process by serving Tryon D. Lewis, Chairman of the Texas Transportation Commission, at 125 E. 11th St., Austin, Texas, 78701-2483, to be forwarded to at his residence at 21 Jacob Dr, Whitby, Ontario L1P 1A9.

IV. JURISDICTION and VENUE

4.1 This Court has jurisdiction in this cause since the damages to Plaintiff Higgins is within the jurisdictional limits of this Court.

4.2 All or a substantial part of the events or omissions giving rise to the claim occurred in Dallas County. Therefore, venue is proper pursuant to §15.001 and §15.002(a)(1) of the Texas Civil Practice & Remedies Code. Additionally, the facts show that the convenience of the parties and the witnesses and the interest of justice would be best served in Gonzales County.

4.3 All conditions precedent have occurred.

4.4 Nothing Plaintiff Higgins did, caused or contributed to this occurrence.

V. FACTS

5.1 On or about March 16, 2016, Defendant Skoczylas was driving westbound on IH 30, in Dallas County, Texas. Defendant Skoczylas failed to control the speed of his tractor trailer

and rear-ended Plaintiff Higgins' vehicle. The collision caused Plaintiff Higgins to collide with a vehicle driven by non-party Kerrie Winn, then causing non-party Kerrie Winn to collide with the vehicle of non-party William Alexander Glover. Defendant Skoczylas was operating a tractor trailer in the course and scope of his employment with Defendant Road Star. The collision occurred with tremendous force, proximately causing Plaintiff Higgins to suffer severe, excruciating, and painful personal injuries.

5.2 Defendant Road Star is a motor carrier that is regulated by the US Department of Transportation and is subject to the Federal Motor Carrier Safety Regulations. Defendant Road Star's US DOT number is 1094105.

VI. NEGLIGENCE OF DEFENDANT ROAD STAR

6.1 At all times relevant hereto, Defendant Road Star was the owner of the tractor and trailer operated and hauled by Defendant Skoczylas. Further, pursuant to the Federal Motor Carrier Safety Administration Regulations, Defendant Skoczylas was considered a statutory employee of Defendant Road Star since he was operating an 18-wheeler for the benefit of Defendant Road Star. Additionally, Defendant Skoczylas was operating the 18-wheeler under Defendant Road Star's operating authority and under Defendant Road Star's DOT number 1094105. Accordingly, Defendant Road Star is liable for the negligence of its statutory employee Defendant Skoczylas under the theory of *respondeat superior*.

6.2 The independent conduct of Defendant Road Star constitutes negligence as that term is known in law. Such negligent acts or omission include, but are not limited to the following:

- a. allowing Defendant Skoczylas to operate its vehicle even though it knew or should have known he was a reckless or incompetent driver;

- b. retaining Defendant Skoczylas to operate its vehicle even though it knew or should have known he was a reckless or incompetent driver;
- c. entrusting a vehicle to Defendant Skoczylas even though it knew or should have known he was a reckless or incompetent driver;
- d. failing to properly train Defendant Skoczylas in the safe operation of a motor vehicle;
- e. failing to properly supervise Defendant Skoczylas's driving activities;
- f. failing to establish and enforce safety rules and regulations;
- g. failing to properly educate, instruct, and supervise the performance of Defendant Skoczylas duties;
- h. failing to adequately train, educate, or provide instructions and orders to Defendant Skoczylas;
- i. failing to provide proper safety manuals and instructions to employees responsible for safety; and
- j. failing to enforce and ensure compliance of established safety and operational rules and regulations for persons operating its equipment.

One, some, or all of the foregoing acts and/or omissions on the part of Defendant Road Star constituted negligence and such negligence was a proximate cause of the occurrence of Plaintiff Higgins' injuries and damages.

VII. NEGLIGENCE OF DEFENDANT SKOCZYLAS

7.1 The collision made the basis of this lawsuit resulted from the improper conduct of Defendant Skoczylas. The conduct of Defendant Skoczylas constituted negligence as that term is understood in law and such negligent conduct was a proximate cause of the occurrence, injuries and damages to Plaintiff Higgins made the basis of this suit. Defendant Skoczylas' negligent actions or omissions include, but are not limited to, one or more of the following non-exclusive particulars:

- a. failing to control the operation of his vehicle;
- b. failing to avoid the incident in question;
- c. failing to keep a proper look out;
- d. failing to apply the brakes properly and/or timely in violation of Texas Transportation Code §547.408)(a)(3);
- e. failing to operate his vehicle in a safe manner;
- f. failing to operate his vehicle as a person of ordinary prudence would have in the same or similar circumstance; and/or
- g. other acts of negligence and negligence per se.

One, some, or all of the foregoing acts and/or omissions on the part of Defendant Skoczylas constituted negligence and such negligence was a proximate cause of the occurrence of Plaintiff Higgins' injuries and damages.

VIII. DAMAGES

8.1 As a result of the incident made the basis of this lawsuit described in the preceding paragraphs and the negligence of Defendants, Plaintiff Higgins sustained significant injuries and damages in the past and will, in reasonable probability, sustain these damages in the future.

8.2 Plaintiff Higgins respectfully requests that the trier of fact determine the amount of his damages and losses that he has incurred in the past and will reasonably incur in the future, as well as the monetary value of these damages, which include, but are not limited to:

- a. past and future physical pain and suffering and mental anguish;
- b. past and future disfigurement;
- c. past and future physical impairment;
- d. past and future medical care expenses;

- e. past and future loss of earning capacity;
- f. past and future household services;
- g. past and future out-of-pocket economic losses.

8.3 Because of all of the above and foregoing, Plaintiff Higgins has suffered actual damages in excess of the minimum jurisdictional limits of the Court for which damages Plaintiff Higgins now brings suit.

8.4 Plaintiff Higgins seeks both prejudgment and post judgment interest as allowed by law, for all costs of court, and all other relief, both in law and in equity, to which he may be entitled.

IX. JURY DEMAND

9.1 Pursuant to Rule 216 of the Texas Rules of Civil Procedure, Plaintiff Higgins respectfully requests and demands a trial by jury. The appropriate jury fee is tendered with the filing of this pleading.

X. REQUESTS FOR DISCLOSURE

10.1 Pursuant to Rule 194, request is made that Defendants disclose, within fifty (50) days of service of this request, the information or material described in Texas Rule of Civil Procedure 194.2 (a)-(l). Defendants must serve a written response to this Requests for Disclosure on Plaintiff Higgins within fifty (50) days after the service of this request. Failure to timely respond shall constitute an abuse of discovery pursuant to Texas Rule of Civil Procedure 215.

XI. CERTIFICATE OF WRITTEN DISCOVERY

11.1 Plaintiff Higgins has served contemporaneously with this petition Requests for Disclosure to Defendants.

XII. RULE 193.7 NOTICE

12.1 Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Plaintiff Higgins hereby gives actual notice to Defendants that any and all documents produced may be used against the Defendants producing the document at any pretrial proceeding and/or at the trial of this matter without the necessity of authenticating the documents.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff Higgins prays that Defendants be cited in terms of law to appear and answer herein, that upon final trial and hearing hereof, that Plaintiff Higgins recovers damages in accordance with the evidence, that Plaintiff Higgins recovers costs of court herein expended, that Plaintiff Higgins recovers interest to which Plaintiff Higgins is justly entitled under the law, and for such other further relief, both general and special, both in law and in equity, to which Plaintiff Higgins may be justly entitled.

Respectfully submitted,

JIM S. ADLER & ASSOCIATES

/s/ Frank W. Robertson

FRANK W. ROBERTSON

State Bar No. 24033129

frobertson@jimadler.com

MICHAEL GOMEZ

State Bar No. 24029578

mgomez@jimadler.com

Bank of America

12605 East Freeway, Suite 400

Houston, Texas 77015

Telephone: (713) 335-1032

Facsimile: (713) 335-1018

ATTORNEYS FOR PLAINTIFF

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

CASE NUMBER: _____ CURRENT COURT: _____

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Plaintiff's Original Petition

FILE DATE OF MOTION: _____
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Road Star Carrier, Inc. d/b/a Road Star Trucking

ADDRESS: 8201 Lawson Road, Milton, Ontario L9T 5E5

AGENT, (if applicable): Rob Dhanoa

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): citation

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____
☐ MAIL ☐ CERTIFIED MAIL
☐ PUBLICATION:
Type of Publication: ☐ COURTHOUSE DOOR, or
☐ NEWSPAPER OF YOUR CHOICE: _____

X OTHER, explain Please mail to Jim S. Adler & Assoc., 12605 East Freewy, Ste. 400, Houston, Texas 77015

2. NAME: Mirosław Skoczylas

ADDRESS: 21 Jacob Dr, Whitby, Ontario L1P 1A9

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): citation

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____
Phone: _____
☐ MAIL ☐ CERTIFIED MAIL
☐ PUBLICATION:
Type of Publication: ☐ COURTHOUSE DOOR, or
☐ NEWSPAPER OF YOUR CHOICE: _____

X OTHER, explain Please mail to Jim S. Adler & Assoc., 12605 East Freewy, Ste. 400, Houston, Texas 77015

ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:

NAME: Frank W. Robertson TEXAS BAR NO./ID NO. 24033129

MAILING ADDRESS: 12605 East Freeway, Suite 400, Houston, Texas 77015

PHONE NUMBER: 713 335-1032 FAX NUMBER: 713 335-1018
area code phone number area code fax number

EMAIL ADDRESS: frobertson@jimadler.com EXHIBIT 2

CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY): _____ COURT (FOR CLERK USE ONLY): _____

STYLED MATTHEW HIGGINS V. ROAD STAR CARRIER, INC. D/B/A ROAD STAR TRUCKING AND MIROSLAW SKOCZYLAS

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

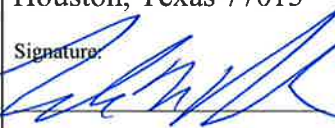
1. Contact information for person completing case information sheet: Name: Frank W. Robertson Address: 12605 E. Fwy #400 City/State/Zip: Houston, Texas 77015 Signature:  Email: frobertson@jimadler.com Telephone: 713-335-1032 Fax: 713-335-1018 State Bar No: 24033129		Names of parties in case: Plaintiff(s)/Petitioner(s): Matthew Higgins Defendant(s)/Respondent(s): Roas Star Carrier, Inc. d/b/a Roas Star Trucking Mirosław Skoczylas		Person or entity completing sheet is: <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____	
2. Indicate case type, or identify the most important issue in the case (select only 1):					
Civil			Family Law		
Contract <i>Debt/Contract</i> <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ <i>Foreclosure</i> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <i>Malpractice</i> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: _____ <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <i>Product Liability</i> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <i>Divorce</i> <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Paternity/Parentage <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____		Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____			
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax		Probate & Mental Health <i>Probate/Wills/Intestate Administration</i> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input checked="" type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____			
3. Indicate procedure or remedy, if applicable (may select more than 1):					
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover	
4. Indicate damages sought (do not select if it is a family law case):					

EXHIBIT 3

- ☐ Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees
- ☐ Less than \$100,000 and non-monetary relief
- ☐ Over \$100,000 but not more than \$200,000
- ☒ Over \$200,000 but not more than \$1,000,000
- ☐ Over \$1,000,000

Rev 2/13



FILED
DALLAS COUNTY
5/17/2016 2:45:15 PM
FELICIA PITRE
DISTRICT CLERK

FELICIA PITRE
DALLAS COUNTY DISTRICT CLERK

NINA MOUNTIQUE
CHIEF DEPUTY

CAUSE NO. DC-16-05944

MATTHEW HIGGINS

VS.

ROAD STAR CARRIER INC DBA ROAD STAR TRUCKING, et al

191st District Court

ENTER DEMAND FOR JURY

JURY FEE PAID BY: MATTHEW HIGGINS

FEE PAID: \$40.00

FORM NO. 353-4—CITATION
~~THE STATE OF TEXAS~~

To: ROAD STAR CARRIER INC D/B/A ROAD STAR TRUCKING
BY SERVING THE CHAIRMAN OF THE STATE HIGHWAY AND
PUBLIC TRANSPARATION COMMISSION
125 E 11TH STREET
AUSTIN, TX 78701-2483

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Your answer should be addressed to the clerk of the **191st District Court**
at 600 Commerce Street, Dallas, Texas 75202.

Said PLAINTIFF being MATTHEW HIGGINS

Filed in said Court 17th day of May, 2016 against
ROAD STAR CARRIER, INC. d/b/a ROAD STAR TRUCKING and MIROSLAW SKOCZYLAS

For suit, said suit being numbered **DC-16-05944** the nature of which demand is as follows:

Suit On **MOTOR VEHICLE ACCIDENT** etc.

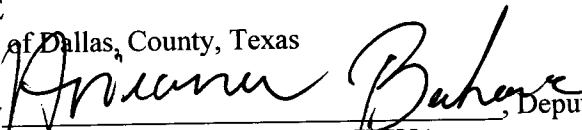
as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 23rd day of May, 2016**

ATTEST: FELICIA PITRE

Clerk of the District Courts of Dallas, County, Texas

By  Deputy
ARIEANA BAHENA

MAIL ATTY (COH)

CITATION

No.: **DC-16-05944**

MATTHEW HIGGINS
VS.
ROAD STAR CARRIER INC DBA ROAD
STAR TRUCKING, ET AL

ISSUED
ON THIS THE **23RD DAY OF MAY, 2016**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By ARIEANA BAHENA, Deputy

Attorney for : Plaintiff
FRANK W ROBERTSON
JIM S ADLER & ASSOCIATES
12605 EAST FREEWAY
SUITE 400
HOUSTON TX 77015
713-335-1032

DALLAS COUNTY CONSTABLE

**FEE
PAID**

**FEE NOT
PAID**

EXHIBIT 5

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-16-05944

Court No: 191st District Court

Style: MATTHEW HIGGINS

vs.

ROAD STAR CARRIER INC DBA ROAD STAR TRUCKING, et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock ____M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock ____M. by summoning the within named Corporation, _____ by delivering to _____

President - Vice President - Registered Agent - in person, of the said _____
_____ a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows:

For Serving Citation	\$ _____	Sheriff _____
For Mileage	\$ _____	County of _____
For Notary	\$ _____	State of _____
Total Fees	\$ _____	By _____

To certify which witness by my hand.

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____
day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

FORM NO. 353-4—CITATION
THE STATE OF TEXAS

To: MIROSLAW SKOCZYLAS
BY SERVING THE CHAIRMAN OF THE STATE HIGHWAY AND
PUBLIC TRANSPIRATION COMMISSION
125 E 11TH STREET
AUSTIN, TX 78701-2483

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Your answer should be addressed to the clerk of the **191st District Court**
at 600 Commerce Street, Dallas, Texas 75202.

Said PLAINTIFF being MATTHEW HIGGINS

Filed in said Court 17th day of May, 2016 against
ROAD STAR CARRIER, INC. d/b/a ROAD STAR TRUCKING and MIROSLAW SKOCZYLAS

For suit, said suit being numbered **DC-16-05944** the nature of which demand is as follows:

Suit On **MOTOR VEHICLE ACCIDENT** etc.

as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 23rd day of May, 2016**

ATTEST: FELICIA PITRE

Clerk of the District Courts of Dallas, County, Texas

By *Ariana Bahena*, Deputy
ARIEANA BAHENA

MAIL ATTY (COH)

CITATION

No.: **DC-16-05944**

MATTHEW HIGGINS

VS.

**ROAD STAR CARRIER INC DBA ROAD
STAR TRUCKING, ET AL**

ISSUED
ON THIS THE 23RD DAY OF MAY, 2016

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By ARIEANA BAHENA, Deputy

Attorney for : Plaintiff
**FRANK W ROBERTSON
JIM S ADLER & ASSOCIATES
12605 EAST FREEWAY
SUITE 400
HOUSTON TX 77015
713-335-1032**

DALLAS COUNTY CONSTABLE

FEES
PAID

FEES NOT
PAID

EXHIBIT 6

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-16-05944

Court No: 191st District Court

Style: MATTHEW HIGGINS

vs.

ROAD STAR CARRIER INC DBA ROAD STAR TRUCKING, et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock ____M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock ____M. by summoning the within named Corporation, _____ by delivering to _____

President - Vice President - Registered Agent - in person, of the said _____
_____ a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows:

For Serving Citation	\$ _____	Sheriff _____
For Mileage	\$ _____	County of _____
For Notary	\$ _____	State of _____
Total Fees	\$ _____	By _____

To certify which witness by my hand.

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____
day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

FORM NO. 353-4—CITATION
~~THE STATE OF TEXAS~~

To: ROAD STAR CARRIER INC D/B/A ROAD STAR TRUCKING
BY SERVING THE CHAIRMAN OF THE STATE HIGHWAY AND
PUBLIC TRANSPARATION COMMISSION
125 E 11TH STREET
AUSTIN, TX 78701-2483

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

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at 600 Commerce Street, Dallas, Texas 75202.

Said PLAINTIFF being MATTHEW HIGGINS

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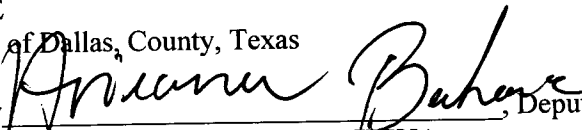
as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 23rd day of May, 2016**

ATTEST: FELICIA PITRE

Clerk of the District Courts of Dallas, County, Texas

By  Deputy
ARIEANA BAHENA

MAIL ATTY (COH)

CITATION

No.: **DC-16-05944**

MATTHEW HIGGINS
VS.
ROAD STAR CARRIER INC DBA ROAD
STAR TRUCKING, ET AL

ISSUED
ON THIS THE **23RD DAY OF MAY, 2016**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By ARIEANA BAHENA, Deputy

Attorney for : Plaintiff
FRANK W ROBERTSON
JIM S ADLER & ASSOCIATES
12605 EAST FREEWAY
SUITE 400
HOUSTON TX 77015
713-335-1032

DALLAS COUNTY CONSTABLE

**FEES
PAID**

**FEES NOT
PAID**

EXHIBIT 7

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-16-05944

Court No: 191st District Court

Style: MATTHEW HIGGINS

vs.

ROAD STAR CARRIER INC DBA ROAD STAR TRUCKING, et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock ____M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock ____M. by summoning the within named Corporation, _____ by delivering to _____

President - Vice President - Registered Agent - in person, of the said _____
a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows:

For Serving Citation	\$ _____	Sheriff _____
For Mileage	\$ _____	County of _____
For Notary	\$ _____	State of _____
Total Fees	\$ _____	By _____

To certify which witness by my hand.

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____
day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

RECEIVED

JUN 8 - 2016
@4:00 PM

Dianne Coffey

FORM NO. 353-4—CITATION
THE STATE OF TEXAS

To: MIROSLAW SKOCZYLAS
BY SERVING THE CHAIRMAN OF THE STATE HIGHWAY AND
PUBLIC TRANSPARATION COMMISSION
125 E 11TH STREET
AUSTIN, TX 78701-2483

AFFIDAVIT ATTACHED

MAIL ATTY (COH)

CITATION

No.: DC-16-05944

MATTHEW HIGGINS
VS.
ROAD STAR CARRIER INC DBA ROAD
STAR TRUCKING, ET AL

ISSUED
ON THIS THE 23RD DAY OF MAY, 2016

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By ARIEANA BAHENA, Deputy

Attorney for : Plaintiff
FRANK W ROBERTSON
JIM S ADLER & ASSOCIATES
12605 EAST FREEWAY
SUITE 400
HOUSTON TX 77015
713-335-1032

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Your answer should be addressed to the clerk of the **191st District Court** at 600 Commerce Street, Dallas, Texas 75202.

Said PLAINTIFF being MATTHEW HIGGINS

Filed in said Court 17th day of May, 2016 against
ROAD STAR CARRIER, INC. d/b/a ROAD STAR TRUCKING and MIROSLAW SKOCZYLAS

For suit, said suit being numbered **DC-16-05944** the nature of which demand is as follows:

Suit On **MOTOR VEHICLE ACCIDENT** etc.

as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on this the 23rd day of May, 2016

ATTEST: FELICIA PITRE

Clerk of the District Courts of Dallas, County, Texas

By Arieana Bahena, Deputy
ARIEANA BAHENA



OFFICER'S RETURN
FOR INDIVIDUALS

Cause No. DC-16-05944

Court No: 191st District Court

Style: MATTHEW HIGGINS

vs.

ROAD STAR CARRIER INC DBA ROAD STAR TRUCKING, et al

Received this Citation the 04th day of June, 20 16 at 4⁰⁰ PM o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by _____ delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery

-----000000-----

OFFICER'S RETURN
FOR CORPORATIONS

Received this Citation the _____ day of _____, 20____ at _____ o'clock _____ M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock _____ M. by summoning the within named Corporation, _____ by delivering to _____ President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows:

For Serving Citation \$ _____
For Mileage \$ _____
For Notary \$ _____
Total Fees \$ _____

Sheriff _____
County of _____
State of _____
By _____

To certify which witness by my hand.

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

RETURN OF SERVICE

Cause No. DC-16-05944

In The 191st Judicial District Court of
Dallas County, Texas

MATTHEW HIGGINS
Plaintiff

V.

ROAD STAR CARRIER, INC.
d/b/a ROAD STAR TRUCKING and
MIROSLAW SKOCZYLAS
Defendant

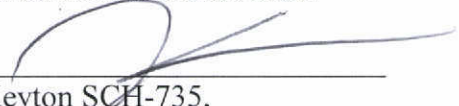
Came to hand on June 08, 2016, at 04:00 PM.

Executed at 125 E. 11th Street, 6th Floor, Austin, TX 78701, within the County of Travis at 11:42 AM on June 09, 2016, by delivering to the within named:

MIROSLAW SKOCZYLAS,

by delivering to the Chair of the Texas Transportation Commission, by and through the Texas Department of Transportation's Office of General Counsel, by delivering to its designated agent, ALICIA RAMON-KANE, a true copy of this Citation together with Plaintiff's Original Petition, Jury Demand, Requests for Disclosure, and Rule 1934.7 Notice, having first endorsed upon such copy of such process the date of delivery, and tendering the \$25 Statutory Fee.

I certify that I am approved by the Supreme Court of Texas, Misc. Docket No. 05-9122 under rule 103 and 536(a) of the TRCP to deliver citations and other notices from any District, County, and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime involving moral turpitude, and I am not interested in the outcome of the above-referenced cause.

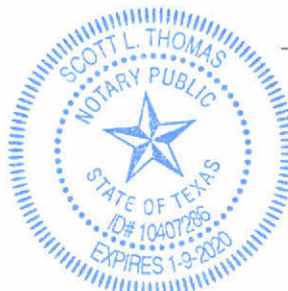
By: 
Jeff Keyton SCH-735,
Exp: 7/31/2017

VERIFICATION

STATE OF TEXAS §
COUNTY OF TRAVIS §

BEFORE ME, A NOTARY PUBLIC, on this day personally appeared Jeff Keyton, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct.

Given under my hand and seal of office this June 09, 2016.




NOTARY PUBLIC, STATE OF TEXAS

16-020720/Higgins

EXHIBIT 8

CAUSE NO. DC-16-05944

MATTHEW HIGGINS	§	IN THE DISTRICT COURT OF
	§	
	§	
	§	
vs.	§	DALLAS COUNTY, TEXAS
	§	
ROAD STAR CARRIER, INC. D/B/A	§	
ROAD STAR TRUCKING AND	§	191st JUDICIAL DISTRICT
MIROSLAW SKOCZYLA	§	

DEFENDANT MIROSLAW SKOCZYLA'S ORIGINAL ANSWER

Defendant MIROSLAW SKOCZYLA ("Defendant") files this Original Answer to Plaintiff Matthew Higgins' Original Petition and would respectfully show the Court as follows:

I

ORIGINAL ANSWER

A. General Denial

1. Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendant generally denies the claims and allegations in Plaintiff's Original Petition and any amendment thereto.

B. Affirmative Defenses

2. Defendant would show, that the injuries and damages of the Plaintiff, if any, made the basis of this lawsuit, were solely caused by the acts or omissions of a party or parties other than Defendant and over whom it possessed no right of control, and for whom Defendant is not responsible at law.

3. Defendant asserts that Plaintiff's own acts or omissions caused or contributed to Plaintiff's alleged damages.

4. Defendant further and alternatively asserts that Plaintiff's injuries and damages, if any, were not caused by Defendant, but were the result of an unavoidable accident.

5. Defendant further asserts that Plaintiff failed to mitigate his damages, if any, and any damages awarded should be reduced by the amount Plaintiff could reasonably have avoided.

6. Pursuant to Tex.Civ.Prac. & Rem. Code §33.001, *et seq.*, upon submission of this case to a fact-finder, Defendant is entitled to a submission of the percentage of responsibility, if any, of Plaintiff and/or other potential parties or responsible third parties for the damages claimed.

7. Defendant further asserts that this Defendant is or may be entitled to certain credits and/or off-sets pursuant to the common law of the State of Texas and/or Chapter 32 and/or Chapter 33 of the Texas Civil Practice & Remedies Code for any settlements by the Plaintiff.

8. Defendant further answers that this Defendant is entitled to contribution and/or indemnity from any Plaintiff, Defendant, or third-party Defendant now or hereinafter named in this lawsuit as provided under the common law of the State of Texas and/or pursuant to Chapter 32 and/or Chapter 33 of the Texas Civil Practices & Remedies Code.

9. Defendant further asserts that recovery of medical or health care expenses incurred is limited to the amount actually paid or incurred by or on behalf of the claimant TEX. CIV. PRAC. & REM CODE §41.0105. “Incurred” has been defined as “become liable to pay.” *See; Keever v. Finlan*, 988 S.W.2d 300, 308 (Tex.App.—Dallas 1999, pet. denied); *Beasley v. Peters*, 870 S.W.2d 191, 196 (Tex.App.—Amarillo 1994, no writ); Comm. On Pattern Jury Charges, State Bar of Tex., Pattern Jury Charges – Malpractice, Premises & Products PJC 80.2 cmt. (2003).

10. Defendant further asserts that, Pursuant to TEX. CIV. PRAC. & REM CODE §18.091(a), Plaintiff must present evidence to prove he has suffered lost earnings, loss of earning

capacity, or loss of contributions of a pecuniary value in the form of a net loss after reduction for income tax payments or unpaid tax liability pursuant to any federal income tax law. Defendant hereby moves the Court to instruct the jury as to whether any recovery for compensatory damages is subject to federal or state income taxes in accordance with TEX. CIV. PRAC. & REM CODE §18.091(b).

11. Defendant further asserts that the calculation of post-judgment interest is governed by TEX. FIN. CODE §304.003(c).

12. Defendant further asserts that pre-judgment interest is disallowed on future damages. TEX. FIN. CODE §304.1045.

C. Reservation of Right to Amend

13. Defendant reserves the right to supplement and/or amend this Original Answer.

II

EXEMPLARY DAMAGES CAP

14. If exemplary damages are awarded to the Plaintiff, Defendant intends to invoke the cap in the Damages Act, Texas Civil Practices and Remedies Code Chapter 41, which restrict and limits the Plaintiff's claim for exemplary damages.

III

REQUEST FOR DISCLOSURE

15. Under the authority of Texas Rule of Civil Procedure 194, Defendant requests that Plaintiff disclose, within 30 days of the service of this request, the information or material described in Rule 194.2.

IV

JURY DEMAND

16. Defendant respectfully demands a trial by jury, and tenders the appropriate fee.

V

NOTICE PURSUANT TO TEXAS RULE OF CIVIL PROCEDURE 193.7

17. Defendant hereby invokes Rule 193.7 of the Texas Rules of Civil Procedure and gives notice of Defendant's intent to use any and/or all documents produced in discovery by any party to this cause as evidence in any pretrial proceedings and/or the trial of this cause.

VI

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant MIROSLAW SKOCZYLA requests that the Court deny Plaintiff's claims, enter judgment in Defendant's favor, that Defendant be discharged with their costs, and for such other and further relief, both general and special, at law and in equity, to which Defendant may show itself justly entitled.

Respectfully submitted,

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

By: 

Michael S. Beckelman
State Bar No. 24042401
909 Fannin Street, Suite 3300
Houston, Texas 77010
Telephone: (713) 353-2000
Facsimile: (713) 785-7780
Michael.Beckelman@wilsonelser.com

**ATTORNEY FOR DEFENDANT
MIROSLAW SKOCZYLA**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was served under Rules 21 and 21a, Texas Rules of Civil Procedure, by Certified Mail, Return Receipt Requested, and/or email on July 5, 2016, upon the following:

Frank W. Robertson
Michael Gomez
Jim Adler & Associates
12605 East Freeway, Suite 400
Houston, Texas 77015
713-335-1032
713-335-1018 (fax)

A handwritten signature in black ink, appearing to read "Michael S. Beckelman", written over a horizontal line.

Michael S. Beckelman

CAUSE NO. DC-16-05944

MATTHEW HIGGINS	§	IN THE DISTRICT COURT OF
	§	
	§	
	§	
vs.	§	DALLAS COUNTY, TEXAS
	§	
ROAD STAR CARRIER, INC. D/B/A	§	
ROAD STAR TRUCKING AND	§	191st JUDICIAL DISTRICT
MIROSLAW SKOCZYLA	§	

**DEFENDANT ROAD STAR CARRIER, INC. D/B/A ROAD STAR TRUCKING'S
ORIGINAL ANSWER**

Defendant ROAD STAR CARRIER, INC. D/B/A ROAD STAR TRUCKING ("Defendant") files this Original Answer to Plaintiff Matthew Higgins' Original Petition and would respectfully show the Court as follows:

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2. Defendant would show, that the injuries and damages of the Plaintiff, if any, made the basis of this lawsuit, were solely caused by the acts or omissions of a party or parties other than Defendant and over whom it possessed no right of control, and for whom Defendant is not responsible at law.

3. Defendant asserts that Plaintiff's own acts or omissions caused or contributed to Plaintiff's alleged damages.

4. Defendant further and alternatively asserts that Plaintiff's injuries and damages, if any, were not caused by Defendant, but were the result of an unavoidable accident.

5. Defendant further asserts that Plaintiff failed to mitigate his damages, if any, and any damages awarded should be reduced by the amount Plaintiff could reasonably have avoided.

6. Pursuant to Tex.Civ.Prac. & Rem. Code §33.001, *et seq.*, upon submission of this case to a fact-finder, Defendant is entitled to a submission of the percentage of responsibility, if any, of Plaintiff and/or other potential parties or responsible third parties for the damages claimed.

7. Defendant further asserts that this Defendant is or may be entitled to certain credits and/or off-sets pursuant to the common law of the State of Texas and/or Chapter 32 and/or Chapter 33 of the Texas Civil Practice & Remedies Code for any settlements by the Plaintiff.

8. Defendant further answers that this Defendant is entitled to contribution and/or indemnity from any Plaintiff, Defendant, or third-party Defendant now or hereinafter named in this lawsuit as provided under the common law of the State of Texas and/or pursuant to Chapter 32 and/or Chapter 33 of the Texas Civil Practices & Remedies Code.

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VI

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant ROAD STAR CARRIER, INC. D/B/A ROAD STAR TRUCKING requests that the Court deny Plaintiff's claims, enter judgment in Defendant's favor, that Defendant be discharged with their costs, and for such other and further relief, both general and special, at law and in equity, to which Defendant may show itself justly entitled.

Respectfully submitted,

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

By: 

Michael S. Beckelman
State Bar No. 24042401
909 Fannin Street, Suite 3300
Houston, Texas 77010
Telephone: (713) 353-2000
Facsimile: (713) 785-7780

Michael.Beckelman@wilsonelser.com

**ATTORNEY FOR DEFENDANT
ROAD STAR CARRIER, INC.
D/B/A ROAD STAR TRUCKING**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was served under Rules 21 and 21a, Texas Rules of Civil Procedure, by Certified Mail, Return Receipt Requested, and/or email on July 5, 2016, upon the following:

Frank W. Robertson
Michael Gomez
Jim Adler & Associates
12605 East Freeway, Suite 400
Houston, Texas 77015
713-335-1032
713-335-1018 (fax)

A handwritten signature in black ink, appearing to read "Michael S. Beckelman", written over a horizontal line.

Michael S. Beckelman

FELICIA PETER, DISTRICT CLERK

CASE SUMMARY

CASE NO. DC-16-05944

MATTHEW HIGGINS
vs.
ROAD STAR CARRIER INC DBA ROAD STAR
TRUCKING, et al

§
§
§
§










Location: **191st District Court**
 Judicial Officer: **SLAUGHTER, GENA**
 Filed on: **05/17/2016**

CASE INFORMATION

Case Type: **MOTOR VEHICLE
ACCIDENT**

PARTY INFORMATION

PLAINTIFF	HIGGINS, MATTHEW	<i>Lead Attorneys</i> ROBERTSON, FRANK W <i>Retained</i> 713-335-1032(W)
DEFENDANT	ROAD STAR CARRIER INC DBA ROAD STAR TRUCKING	BECKELMAN, MICHAEL <i>Retained</i> 713-353-2000(W)
	SKOCZYLAS, MIROSLAW	BECKELMAN, MICHAEL <i>Retained</i> 713-353-2000(W)

DATE	EVENTS & ORDERS OF THE COURT	INDEX
05/17/2016	NEW CASE FILED (OCA) - CIVIL	
05/17/2016	 ORIGINAL PETITION PLAINTIFF???S ORIGINAL PETITION	
05/17/2016	 ISSUE CITATION COMM OF INS OR SOS	
05/17/2016	 JURY DEMAND Party: PLAINTIFF HIGGINS, MATTHEW	
05/23/2016	CITATION SOS/COI/COH/HAG  ROAD STAR CARRIER INC DBA ROAD STAR TRUCKING Served: 06/09/2016  SKOCZYLAS, MIROSLAW Served: 06/09/2016 COH MAIL ATTY-AB	
06/29/2016	 RETURN OF SERVICE ROAD STAR CARRIER IN DBA ROAD STAR TRUCKING	
06/29/2016	 RETURN OF SERVICE MIROSLAW SKOCZYLAS	
07/05/2016	 ORIGINAL ANSWER - GENERAL DENIAL Party: DEFENDANT SKOCZYLAS, MIROSLAW DEFENDANTS	
07/05/2016	 ORIGINAL ANSWER - GENERAL DENIAL Party: DEFENDANT ROAD STAR CARRIER INC DBA ROAD STAR TRUCKING DEFENDANTS	

DATE

FINANCIAL INFORMATION

CASE No. DC-16-05944

	PLAINTIFF HIGGINS, MATTHEW		
	Total Charges		381.03
	Total Payments and Credits		381.03
	Balance Due as of 7/6/2016		0.00
05/18/2016	Charge	PLAINTIFF HIGGINS, MATTHEW	381.03
05/18/2016	CREDIT CARD - Receipt # 31300-2016-DCLK	PLAINTIFF HIGGINS, MATTHEW	(381.03)
	TEXTFILE (DC)		

STATE OF TEXAS }
COUNTY OF DALLAS }

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office
in Dallas, Texas, this 6 day of July, A.D., 2016.

FELICIA PITRE, DISTRICT CLERK
DALLAS COUNTY, TEXAS

By

[Signature] Deputy